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(804) 445-1814

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11 JUL 1991

State of North Carolina
Department of Environment, Health,
and Natural Resources
Attn: Mr. Jack Butler
Division of Solid Waste Management
P.O. Box 27687
Raleigh, North Carolina 27611-7687

Re: Health and Safety Plan (Draft Final) for Site Inspections
at Nine Sites, MCB Camp Lejeune

Dear Mr. Butler:

This letter is in response to N.C. DEHNR letter dated May 22, 1991 concerning a comment to the Draft Final Health and Safety (H&S) Plan for the subject site inspections. This comment concerned the level of respiratory protection; the use of Self Contained Breathing Apparatus' (SCBAs) versus Air Purifying Respirators (APRs) was recommended.

It is the opinion of our consultant that, due to the type and concentrations of contaminants potentially present at these sites, SCBAs are not initially warranted unless two conditions exist: 1) positive HNU readings above designated background levels are detected or 2) a worker wearing an APR perceives any odor, irritation, or other discomfort which would indicate breakthrough of the chemical cartridge. If either of these two conditions exist, use of SCBAs will be considered warranted.

To further clarify this in the H&S Plan, the following sentence will be added to specify conditions warranting Level B (SCBA) respiratory protection:

"Anytime a worker wearing an APR perceives any odor, irritation, or other discomfort which would indicate breakthrough of the chemical cartridge."

This condition is in addition to that already stated in the H&S Plan that "anytime positive HNU readings . . . are measured in the worker's breathing zone."

This addition will be reflected in an addendum sheet to the H&S Plan.

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Concerning the use of APRs, for these site inspections APRs are being used solely at the discretion of the workers for the purpose of providing a barrier against dust, odors, and any perception of irritation and are not being used as a level of protection against chemical contaminants.

If you have any questions or comments concerning this letter, contact Ms. Laurie Boucher, P.E., at (804) 445-1814.

Sincerely,

P. A. RAKOWSKI, P.E.
Head
Environmental Programs Branch
Environmental Quality Division
By direction to the Commander

Copy to:
MCB Camp Lejeune (AC/S, Environmental Management)
EPA Region IV
NUS Corporation (Mr. Daryl Hutson)

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